

Warren S. Wolf, Esquire
GOLDBERG & WOLF, LLC
1949 Berlin Road, Suite 201
Cherry Hill, New Jersey 08003
Telephone: (856) 651-1600
Facsimile: (856) 651-1615
*Attorneys for Plaintiffs,
Michael Moreno and Medpro, Inc.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MICHAEL MORENO AND MEDPRO, INC., Plaintiffs, v. RORY E. TRINGALI, Defendant.	DOCKET NO. 14-CV-04002-JBS-KMW CIVIL ACTION NOTICE OF MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT AND FOR OTHER RELIEF ORAL ARGUMENT REQUESTED
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TO: Stephen N. Dratch, Esquire
Franzblau Dratch, P.C.
Plaza One
354 Eisenhower Parkway

PLEASE TAKE NOTICE that by way of motion Plaintiffs shall make application to the Court for an Order (1) holding the Defendant in contempt for violating the permanent injunction, (2) increasing the judgment entered against the Defendant for three violations of the Settlement Agreement and counsel fees, (3) compelling the Defendant to appear for his deposition and to produce the requested documents and (4) determining the Defendant cannot assert his right against self-incrimination in such deposition.

PLEASE TAKE FURTHER NOTICE that Certification of Plaintiff, Brief, Certification of Counsel, proposed form of order and Certification of Service are being filed herewith in support of Plaintiffs' Motion. If opposition is timely filed and served, oral argument is requested.

Date: 9/14/18

/s/ Warren S. Wolf
Warren S. Wolf, Esquire